**MCI Communications
Corporation**

MCI

1801 Pennsylvania Avenue, NW
Washington, DC 20006
202 887 2993
FAX 202 887 2676
Keith.Seat@MCI.Com

Keith L. Seat
Senior Counsel for Competitive Strategies
Federal Law and Public Policy

ORIGINAL

June 13, 2000

<u>Hand Delivery</u>

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

> Re: EX PARTE -- CC Docket No. 00-65: Application of SBC Communications
> Inc. Pursuant to Section 271 of the Telecommunications Act of 1996 to
> <u>Provide InterLATA Services in Texas</u>

Dear Ms. Salas:

On June 12, 2000, Patricia Proferes, Brad Stillman and I of WorldCom, Inc. and
Jerry Epstein of Jenner & Block met sequentially with Helgi Walker and Tracy Marshall, legal
advisor and intern to Commissioner Furchtgott-Roth; Sarah Whitesell, legal advisor to
Commissioner Tristani; and Kyle Dixon, legal advisor to Commissioner Powell. In each meeting
we discussed the status of WorldCom's two month long offering of residential service in Texas
and OSS and related issues in the pending application of SBC to offer in-region long distance
services in the state of Texas. In particular, we discussed various problems of SBC that prevent
WorldCom from being able to ramp up to commercial volumes as set forth in the enclosures, and
in accord with our comments.

In accordance with section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, an
original and one copy of this Notice are being filed with your office.
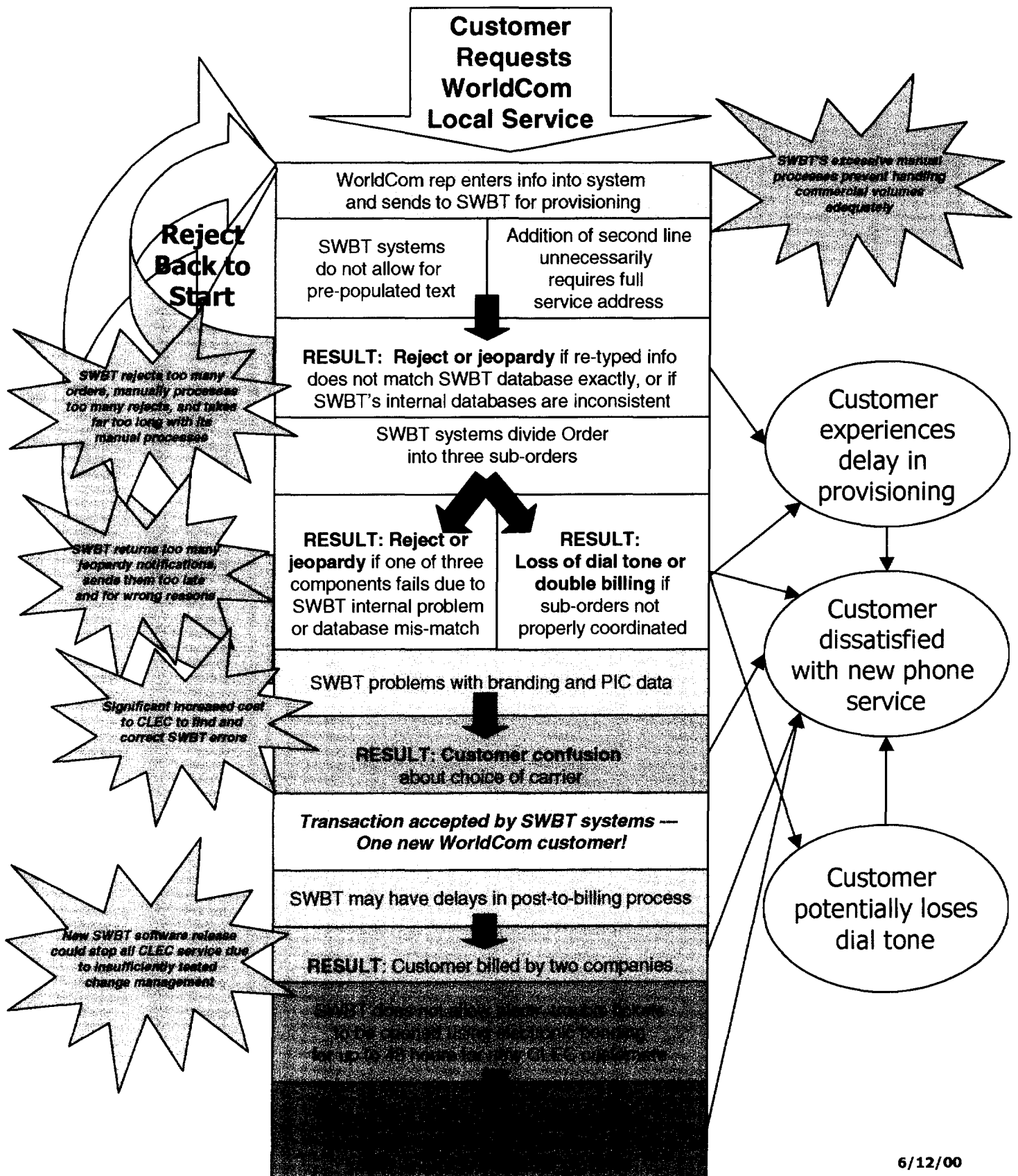
Sincerely,

Keith L. Seat

Enclosures

cc: Helgi Walker
     Tracy Marshall
     Sarah Whitesell
     Kyle Dixon

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List A B C D E

Numerous SWBT Systemic Problems Result in Customer Dissatisfaction with Competition

Customer Requests WorldCom Local Service

Reject Back to Start

WorldCom rep enters info into system and sends to SWBT for provisioning

SWBT systems do not allow for pre-populated text

Addition of second line unnecessarily requires full service address

RESULT: Reject or jeopardy if re-typed info does not match SWBT database exactly, or if SWBT's internal databases are inconsistent

SWBT systems divide Order into three sub-orders

RESULT: Reject or jeopardy if one of three components fails due to SWBT internal problem or database mis-match

RESULT: Loss of dial tone or double billing if sub-orders not properly coordinated

SWBT problems with branding and PIC data

RESULT: Customer confusion about choice of carrier

Transaction accepted by SWBT systems — One new WorldCom customer!

SWBT may have delays in post-to-billing process

RESULT: Customer billed by two companies

SWBT's excessive manual processes prevent handling commercial volumes adequately

SWBT rejects too many orders, manually processes too many rejects, and takes far too long with its manual processes

SWBT returns too many jeopardy notifications, sends them too late, and for wrong reasons

Significant increased cost to CLEC to find and correct SWBT errors

New SWBT software release could stop all CLEC service due to insufficiently tested change management

Customer experiences delay in provisioning

Customer dissatisfied with new phone service

Customer potentially loses dial tone

Status of SBC UNE-P Barriers to Residential
Local Competition in Texas

Issue/Problem	Status as of April 5	Status as of June 12
1. Trouble-tickets may be manual for first 24-48 hours	SBC fixed on March 18; some problems remain	Problem not fixed for electronic bonding, which WorldCom uses
2. Required to send full service address on every order, even if simply migrating customers	SBC fix not planned until May 27	May 27 fix helpful, but did not resolve whole problem (esp. second lines)
3. Unable to get Customer Service Records in "parsed" format to avoid excessive re-keying	Not fixed, although May 27 fix should help limit scope of problem	Not fixed; May 27 fix appears helpful, but not for second lines, directory listings and backend requirements
4. Loss of dial tone from breaking orders into three parts and failing to coordinate them	SBC "investigating" problem	Still seeing problems from use of sub-orders, but SBC making no improvements

5. LIDB I: Issue re updating customer records with SBC at time of initial order	SBC fixed after filing 271 application; production testing needed	Production use revealed serious problems that SBC has not addressed or even promised to address
6. LIDB II: Lack of adequate automated processes to update customer records with SBC _after_ initial order	SBC fix contemplated, but not yet scheduled or made; no specs provided	Not scheduled before end of year; specs not yet available
7. Excessive manual handling, including too many manual rejects, and delayed manual rejects	Not fixed	Not fixed
8. Improper rejects of competitors' orders due to SBC's internal databases containing conflicting address data	Not fixed	Internal SWBT databases not fixed, although problem may be seen differently because of May 27 changes
9. Failure to properly relate multiple customer orders	Not fixed	Not fixed
10. Improper "glue" charges for UNE-Platform	SBC continues to push for charges, but not collecting until Texas PUC resolves	No change; briefs filed, but Texas PUC has not yet resolved
11. SBC performance remedy plan fails to include critical measures, such as change management	Not fixed	New measures being discussed which may reduce problem partially, but not finalized

12. SBC performance remedy plan based on number of occurences, low per occurence payments, and low per measurement caps insufficient to deter backsliding	Not fixed	Not fixed
13. Insufficiently tested change management	Not done	Not done
14. Key SBC pre-ordering and ordering interfaces not available for much of the night	Not fixed	Not fixed
15. Must resend orders transmitted when SBC system is unavailable	Not fixed	Not fixed; SBC says some number of orders will be held in "basket" when its system is down, but CLECs are not to rely on basket

WorldCom
June 12, 2000